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Attorneys for Defendant  
Mr. Vasquez

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:21-MJ-72-DB
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>PRELIMINARY HEARING AND EXCLUDE</b>
VINCENT JOSE VASQUEZ,	) <b>TIME</b>
Defendant.	) Date: June 11, 2021
	) Time: 2:00 p.m.
	) Judge: Deborah Barnes

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney David Spencer, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Vincent Jose Vasquez, that the preliminary hearing currently set for June 11, 2021 at 2:00 be continued to June 24, 2021 at 2:00 p.m.

The parties specifically stipulate as follows:

1. The Complaint in this case was filed on May 5, 2021, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on May 6, 2021. The court set a preliminary hearing date of May 20, 2021.
2. At the joint request of the parties, on May 12, 2021, the Court signed an order to continue the preliminary hearing to June 11, 2021.

1           3.     The parties jointly move for a second extension of time of the preliminary hearing  
2                     date to June 24, 2021, at 2:00 p.m., before the duty Magistrate Judge, Judge  
3                     Carolyn K. Delaney pursuant to Rule 5.1(d) of the Federal Rules of Criminal  
4                     Procedure. The delay is required to allow the defense reasonable time for  
5                     preparation, for the government's continuing investigation of the case, and for the  
6                     parties to negotiate a potential pre-indictment resolution. The parties further agree  
7                     that the interests of justice served by granting this continuance outweigh the best  
8                     interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
9                     3161(h)(7)(A).

10           4.     The parties agree that good cause exists for the extension of time, and that the  
11                     extension of time would not adversely affect the public interest in the prompt  
12                     disposition of criminal cases. Therefore, the parties request that the time between  
13                     June 11, 2021, and June 24, 2021, be excluded pursuant to 18 U.S.C. §  
14                     3161(h)(7)(B)(iv), Local Code T-4.

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16                                     Respectfully submitted,

17                                     HEATHER E. WILLIAMS  
18                                     Federal Defender

19     Date: June 4, 2021

/s/ Hootan Baigmohammadi  
                                   HOOTAN BAIGMOHAMMADI  
                                   Assistant Federal Defender  
                                   Attorneys for Defendant  
                                   Mr. Vasquez

22  
23     Date: June 4, 2021

                                   PHILLIP A. TALBERT  
                                   United States Attorney

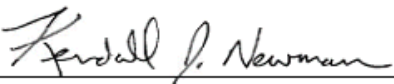
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25                                     /s/ David Spencer  
                                   DAVID SPENCER  
26                                     Assistant United States Attorney  
27                                     Attorneys for Plaintiff  
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**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 7, 2021

  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE